

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

HOWARD L. THOMAS,

Plaintiff,

v.

SCOTT DALE CLARK, *et al.*,

Defendants.

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CIVIL ACTION NO. 5:21-CV-00640-OLG

**NOTICE OF APPEARANCE OF ADDITIONAL COUNSEL  
FOR DEFENDANTS WILSON COUNTY, TEXAS,  
DEPUTY FRANK ASHTON, AND SHERIFF JIM STEWART**

Defendants Wilson County, Texas, Deputy Frank Ashton<sup>1</sup>, and Sheriff Jim Stewart (collectively “County Defendants”) notify the Court and parties that the following attorney is appearing as additional counsel of record for the County Defendants:

Tiffany Santhavi  
State Bar No. 24103917  
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Ben Zinnecker will remain as the lead attorney of record in this case for the County Defendants.

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<sup>1</sup> Deputy Frank Ashton is erroneously named “Roy Ashton” in the state court case caption.

County Defendants request the above-referenced additional counsel be added to the docket in the above-entitled matter, and the above-referenced attorney be served with all filings, documents, and notices in this matter.

Respectfully,

By: /s/ Ben Zinnecker

Ben Zinnecker

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**COUNSEL FOR DEFENDANTS,  
WILSON COUNTY, TEXAS, DEPUTY  
FRANK ASHTON, AND SHERIFF JIM  
STEWART**

**CERTIFICATE OF SERVICE**

I certify that on the 14<sup>th</sup> day of March, 2022, a copy of the foregoing document was electronically filed on the CM/ECF system, which will automatically serve a Notice of Electronic Filing to all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Ben Zinnecker

Ben Zinnecker